



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMR/MEF/PP
F. #2023R00737

610 Federal Plaza
Central Islip, New York 11722

December 3, 2024

By ECF and E-Mail

The Honorable Lee G. Dunst
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Matthew Smith
Criminal Docket No. 24-423 (NJC)

Dear Judge Dunst:

The government submits this letter in advance of the defendant Matthew Smith's arraignment, which is scheduled for today, December 3, 2024 at noon, to update the Court as to the procedural history of this case and the government's position regarding detention.

On October 17, 2024, a grand jury sitting in the Eastern District of New York returned the above-captioned indictment charging the defendant, Michael Jeffries ("Jeffries") and James Jacobson with one count of sex trafficking, in violation of 18 U.S.C. § 1591, and 15 counts of interstate prostitution, in violation of 18 U.S.C. § 2422(a) (the "Indictment"). ECF Dkt. No. 1. On October 22, 2024, the government submitted a letter in support of the defendant's detention, citing inter alia his status as a citizen of the United Kingdom. ECF Dkt. No. 9 at 7. Later that same day, the defendant was arrested and made his initial appearance in the Southern District of Florida. ECF Dkt. No. 12. At the initial appearance, the defendant waived a detention hearing and was ordered to be transferred in custody to this district. Id. (24-mj-08554-BER-2, ECF Dkt. No. 9). On November 19, 2024, the defendant arrived in district, and since that date, he has been held at the Metropolitan Detention Center ("MDC"). On November 20, 2024, counsel for the defendant filed a motion requesting that the defendant's arraignment be scheduled for December 2, 2024 or December 3, 2024 (ECF Dkt. No. 39), and on November 22, 2024, the Honorable Nusrat J. Choudhury, United States District Judge, granted that motion.

Since the defendant's initial appearance, the parties have conferred regarding the defendant's proposed application to be released pending trial, and, at this time, the government agrees that a bond with the below-listed conditions, in addition to the standard conditions, is sufficient to overcome the presumption of detention, pursuant to 18 U.S.C. § 3142(e)(3)(D), which applies in this case. The agreed-upon conditions are as follows:

1. A \$10,000,000 bond, co-signed by six suretors, which are: Jeffries, Susan Jeffries, Diane Chang, Patrick Wiesel, Andrew Jeffries and Annabel Jeffries;
2. Securing of the bond by three homes, which are unencumbered;¹
3. Home detention with GPS monitoring, with permission to leave for personal medical appointments, meetings with counsel and religious services, as well as to accompany Jeffries to medical appointments;
4. The defendant's completion of an affirmation of financial assets in which he attests to the entirety of assets held by himself and Jeffries;
5. The defendant's resignation as Trustee of the Michael S. Jeffries Revocable Trust (the "Jeffries Trust");
6. The defendant's resignation as an authorized signer on Jeffries' financial accounts;
7. Agreement that the Jeffries Trust will operate with the following restrictions:
 - Outbound or withdrawal transactions are limited to \$125,000 per month to cover all necessary overhead expenses;
 - No outgoing transactions to any bank or individual located outside of the United States;
 - In the event that the defendant and Jeffries require more than \$125,000 per month for expenses, such withdrawal exceeding that amount must be approved by the government and the defendant will provide confirmation of such payment to the government;
 - The Trustee shall provide the government and its agents online access to all accounts for real-time verification of transactions; and
 - Any other terms necessary to ensure that these transaction limits are followed.²
8. Counsel will surrender the defendant's passport to Pretrial Services.

For the reasons set forth in the government's October 22, 2024 detention memorandum, in conjunction with the above, the government respectfully submits that the Court

¹

These are the homes of Susan Jeffries, located at [REDACTED]; the home of Jeffries and the defendant, located at [REDACTED]; and the home of Diane Chang, located at [REDACTED]

²

The parties agree that compliance with the conditions related to the Jeffries Trust and Jeffries' financial accounts will be monitored by the government, with the consent and cooperation of counsel and the defendant, as Pretrial Services is unable to monitor such conditions.

only release the defendant upon the execution of a substantial, secured bond, with stringent conditions as outlined above and agreed by the parties.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: Clerk of the Court (NJC) (by ECF)
Counsel of Record (by ECF)